

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

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TODD BANK, *on behalf of himself*
and all others similarly situated,

Plaintiff,

No.: 1:18-cv-01311

-against-

FREEDOM DEBT RELIEF, LLC,
FREEDOM FINANCIAL NETWORK, LLC
and FREEDOM FINANCIAL NETWORK FUNDING,
LLC,

Defendants.

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**STIPULATION OF VOLUNTARY DISMISSAL
WITH PREJUDICE FED. R. CIV. P. 41(a)(1)(A)(ii)**

Plaintiff, *pro se*, Todd C. Bank, and defendants Freedom Debt Relief, LLC, Freedom Financial Network, LLC, and Freedom Financial Network Funding, LLC, by and through their counsel of record, **HEREBY STIPULATE AND AGREE**, that pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action is dismissed with prejudice as to Plaintiff *pro se*'s individual claims against defendants Freedom Debt Relief, LLC, Freedom Financial Network, LLC, and Freedom Financial Network Funding, LLC.

IT IS SO STIPULATED.

Dated: May 4, 2020

PLAINTIFF *pro se*

By: /s/ Todd C. Bank
Todd C. Bank

KLEIN MOYNIHAN TURCO LLP

By: /s/ Neil E. Asnen
Neil E. Asnen

*Attorneys for Defendants
Freedom Debt Relief, LLC,
Freedom Financial Network, LLC, and
Freedom Financial Network Funding, LLC*